

EXHIBIT 41

Pasqualina Rausa

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

PASQUALINA RAUSA,)	
)	
Plaintiff,)	
)	MDL NO. 16-2738
vs.)	(FLW) (LHG)
)	
JOHNSON & JOHNSON, et al.,)	CASE NO.
)	3:20-cv-02947-FLW-LHG
Defendants.)	

WEDNESDAY, JANUARY 27, 2021

Remote deposition of Pasqualina Rausa,
conducted at the location of the witness in Ponte Vedra,
Florida, commencing at 12:58 p.m., on the above date,
before Dianne N. Sarkisian, Certified Shorthand Reporter
and Registered Professional Reporter.

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Pasqualina Rausa

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APPEARANCES:

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Appearing on behalf of the Plaintiff
(via Zoom.)

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Appearing on behalf of the Defendants
(via Zoom.)

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Ponte Vedra, Florida

Wednesday, January 27, 2021

12:58 p.m.

(PLAINTIFFS PREMARKED EXHIBITS 1-3

PHOTOGRAPHS MARKED FOR IDENTIFICATION.)

COURT REPORTER: Good afternoon. We are
on the record.The attorneys participating in this
deposition acknowledge that I, court reporter, am
not present with the witness and that I will be
reporting the proceedings and administering the
oath remotely.This arrangement is pursuant to the
Florida Supreme Court Administrative Order
AOSC-20-16 and extended by AOSC-20-17. The
parties and their counsel consent to this
arrangement and waive any objections to this
manner of reporting.Please indicate your agreement by
stating your name and your agreement on the
record.

Thank you.

MS. MCGRODER: Lori McGroder of Shook
Hardy & Bacon, on behalf of J&J, and we agree to

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EXHIBITS

Exhibit Page
(Exhibits attached to transcript.)PLAINTIFF'S PREMARKED EXHIBITS 1-3 4
PHOTOGRAPHS

DEFENDANT'S EXHIBIT 1, DEFENDANT'S 30

JOHNSON & JOHNSON AND JOHNSON &

JOHNSON CONSUMER INC.'S NOTICE OF

DISCOVERY DEPOSITION VIA REMOTE

TECHNOLOGY OF PASQUALINA RAUSA AND

SUBPOENA DUCES TECUM

DEFENDANT'S EXHIBIT 2 AND 2-A, 33

PLAINTIFF PROFILE FORM AND SIGNED

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DEFENDANT'S EXHIBIT 5, MEDICAL RECORD 103

PRAUSACMAMR, BATES 58-61

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the process here today.

MS. EMMEL: Jennifer Emmel with Beasley
Allen for the Plaintiff. We also agree.COURT REPORTER: Okay. I'll swear the
witness in.

Ma'am, I'll swear you in under oath.

Please raise your right hand.

(Witness complied.)

COURT REPORTER: Do you swear the
testimony you're about to give is the truth, the
whole truth, and nothing but the truth?

THE WITNESS: Yes, I do.

COURT REPORTER: Thank you, ma'am.

Please proceed.

PASQUALINA RAUSA,

was thereupon called as a witness herein, and after
having first been duly sworn or affirmed to testify
to the truth, was examined and testified as follows:

DIRECT EXAMINATION

BY MS. MCGRODER:

Q. Well, good afternoon, Ms. Rausa. We met
very briefly by video right before we got started
here. I'm Lori McGroder, and I represent Johnson
& Johnson.

2 (Pages 2 to 5)

Pasqualina Rausa

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<p>1 Q. What years was he deployed?</p> <p>2 A. He went... When the Gulf War broke out,</p> <p>3 he deployed and he stayed... He deployed in</p> <p>4 November and he stayed till the following May. So</p> <p>5 I don't remember the year that was, though; 1990s.</p> <p>6 I don't remember what year.</p> <p>7 Q. Early '90s?</p> <p>8 A. I think so, yeah.</p> <p>9 Q. And so what did he do during his...</p> <p>10 What was his military experience like, his job?</p> <p>11 A. He was in communications.</p> <p>12 Q. Any other times he was deployed?</p> <p>13 A. No.</p> <p>14 MS. McGRODER: Let's take a short break,</p> <p>15 five, ten minutes. And when we come back, we'll</p> <p>16 talk a little bit more about your medical history,</p> <p>17 okay?</p> <p>18 THE WITNESS: Um-hum.</p> <p>19 MS. McGRODER: Okay, thank you.</p> <p>20 COURT REPORTER: Okay. Off the record.</p> <p>21 It's 2:37. We'll come back at 2:47, something</p> <p>22 like that.</p> <p>23 MS. McGRODER: Okay, 2:47.</p> <p>24 COURT REPORTER: Yes, ma'am. Thank you.</p> <p>25 (Recess taken at 2:37 p.m.)</p>	<p>1 A. About five days.</p> <p>2 Q. And did you ever have irregular periods?</p> <p>3 A. No, no. I never had a problem.</p> <p>4 Q. Did you ever have periods that were too</p> <p>5 heavy?</p> <p>6 A. No.</p> <p>7 Q. Did you ever have painful periods?</p> <p>8 A. No.</p> <p>9 Q. Did you ever have symptoms with your</p> <p>10 menstrual cycle like cramping or headaches?</p> <p>11 A. No.</p> <p>12 Q. Did you ever at any time have to see a</p> <p>13 physician related to your menstrual cycle?</p> <p>14 A. No.</p> <p>15 Q. Did you ever miss any school, for</p> <p>16 example, because you had to stay home with cramps</p> <p>17 or anything like that?</p> <p>18 A. No. I could never understand why women</p> <p>19 or girls used to complain 'cause I never had that.</p> <p>20 Q. And do you know what year you finished</p> <p>21 menopause?</p> <p>22 A. I believe it was between 55 and 56.</p> <p>23 Q. Do you know when your last menstrual</p> <p>24 period was?</p> <p>25 A. I wouldn't be able to tell you the</p>
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<p>1 (Back on the record at 2:47 p.m.)</p> <p>2 COURT REPORTER: We're on the record.</p> <p>3 MS. McGRODER: Thank you.</p> <p>4 BY MS. McGRODER:</p> <p>5 Q. Ms. Rausa, I'm going to ask you a few</p> <p>6 questions and this is where we're going to get</p> <p>7 into areas that are, you know, about your personal</p> <p>8 and medical history, including your gynecologic</p> <p>9 history.</p> <p>10 So once again, I don't mean to ask you</p> <p>11 anything, you know, to embarrass you or anything</p> <p>12 like that. Just have to ask these questions based</p> <p>13 on the type of lawsuit you brought, okay?</p> <p>14 A. I'm fine.</p> <p>15 Q. All right. How old were you when you</p> <p>16 first got your period?</p> <p>17 A. 11.</p> <p>18 Q. So that would have been about 1966?</p> <p>19 A. Um-hum.</p> <p>20 Q. And over the course of your life, having</p> <p>21 menstrual periods, did they ever change in nature</p> <p>22 or were they typically the same?</p> <p>23 A. No, typically the same.</p> <p>24 Q. And tell me about your periods. Were</p> <p>25 they, uh... How many days, typically?</p>	<p>1 month, no. I don't know.</p> <p>2 Q. Did you have symptoms when you were</p> <p>3 going through menopause?</p> <p>4 A. The only thing I had was hot flashes.</p> <p>5 Q. For how long did you experience hot</p> <p>6 flashes with menopause?</p> <p>7 A. Well, I know that I retired in, I was</p> <p>8 around 61, and I remember having to keep a little</p> <p>9 fan on my desk even in the winter, 'cause I always</p> <p>10 had the hot flashes. But when I retired, I don't</p> <p>11 remember them as much, but when I worked I had</p> <p>12 them.</p> <p>13 Q. So you would have retired in 2016, did</p> <p>14 you say?</p> <p>15 A. I was almost 61 when I retired.</p> <p>16 Q. Do you remember when your hot flashes</p> <p>17 began?</p> <p>18 A. No, no, I do not.</p> <p>19 Q. Did you ever seek treatment for your hot</p> <p>20 flashes?</p> <p>21 A. No.</p> <p>22 Q. Did you report your symptoms of hot</p> <p>23 flashes to any doctors?</p> <p>24 A. I might have, but I don't think it was</p> <p>25 an issue.</p>

Pasqualina Rausa

<p style="text-align: right;">Page 178</p> <p>1 MS. McGRODER: I have no further 2 questions, either. 3 Ms. Rausa, it was wonderful meeting you 4 today. And thank you very much for being here for 5 the deposition. I appreciate your patience with 6 the whole virtual process and just really good 7 luck to you and thanks for participating. 8 THE WITNESS: Thank you. 9 MS. McGRODER: Let's go off the record. 10 COURT REPORTER: Yes, ma'am, off the 11 record. 12 (Deposition concluded at 5:23 p.m. 13 Signature not reserved.) 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 180</p> <p>1 CERTIFICATE OF REPORTER 2 3 THE STATE OF FLORIDA) 4 COUNTY OF MIAMI-DADE) 5 6 I, DIANNE N. SARKISIAN, CSR, Certified 7 Shorthand Reporter, and Notary Public of the State 8 of Florida, do hereby certify that I was authorized 9 to and did stenographically report the deposition 10 of PASQUALINA RAUSA; that a review of the 11 transcript was waived; and that pages 1 through 178 12 is a true record of the foregoing transcript. 13 I FURTHER CERTIFY that I am not a 14 relative nor employee of any counsel, nor any of 15 the parties in said suit, nor am I financially 16 interested in the action. 17 DATED this 5th day of February 2021, at 18 Miami; Miami-Dade County, Florida. 19 20 21 _____ Dianne N. Sarkisian Certified Court Reporter 22 23 24 25</p>
<p style="text-align: right;">Page 179</p> <p>1 CERTIFICATE OF OATH 2 3 THE STATE OF FLORIDA) 4 COUNTY OF MIAMI-DADE) 5 6 I, Dianne N. Sarkisian, CSR, Certified 7 Shorthand Reporter, in my capacity as a Notary Public of 8 the State of Florida at Large, authorized to administer 9 oaths on this 27th day of January, 2021, at 12:58 PM, 10 certify that PASQUALINA RAUSA appeared before me via 11 Zoom pursuant to Florida Supreme Court Administrative 12 Order AOSC-20-16 and extended by AOSC-20-17, and took an 13 oath or affirmation for the purpose of giving testimony 14 in the above-entitled matter. 15 16 17 18 _____ Dianne N. Sarkisian Notary Public - State of Florida 19 My Commission No. GG 959678 Expires: 02-18-2024 20 21 22 23 24 25</p>	

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